

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

DEBRA JANSEN,

Plaintiff,

v.

**DOGGIE DELIGHT, INC. AND STEVEN
WARD, INDIVIDUALLY,**

Defendants.

§
§
§
§
§
§
§
§
§

Case No. 3:23-cv-693-B-BN

UNOPPOSED MOTION TO CONTINUE MEDIATION

Counsel for Plaintiff Debra Jansen (“Jansen”) files the following Unopposed Motion to Continue Mediation and in support thereof would show the following:

Counsel for Plaintiff has been unable to contact and/or communicate with Plaintiff despite repeated attempts. Mediation in this matter has been set for this Friday, December 15, 2023 at 1:00 p.m. with Magistrate Ray, which is also the last day the parties have been given to mediate this matter. At this time, counsel for Plaintiff does not expect Plaintiff to appear for the mediation. In order to conserve judicial resources, and to be respectful of the Court’s time as well as the time of Defendant and its counsel, counsel for Plaintiff hereby requests that the Court 1) cancel the mediation currently scheduled for December 15, 2023 and 2) extend the mediation deadline in this matter by 45 days.

A 45-day extension of the mediation deadline will give counsel time to try to communicate with Plaintiff and/or determine that communication is not possible, which would of course require further communication with the Court.

Counsel for Defendant does not oppose this motion.

WHEREFORE, PREMISES CONSIDERED, Counsel for Plaintiff respectfully requests that the Court postpone the mediation scheduled for this Friday, December 15, 2023, and give the parties an additional 45 days in which to either re-schedule mediation or otherwise settle this matter. This Motion is not requested for purposes of delay, but so that justice may be done.

Respectfully submitted,

WELMAKER LAW, PLLC

/s/ Douglas B. Welmaker

Douglas B. Welmaker

Attorney-in-Charge

State Bar No. 00788641

Welmaker Law, PLLC

409 N. Fredonia, Suite 118

Longview, Texas 75601

Phone: (512) 799-2048

Email: doug@welmakerlaw.com

ATTORNEY FOR PLAINTIFF

CERTIFICATE OF CONFERENCE

I certify that I conferred with counsel for Defendant, and he is not opposed to this Motion.

/s/ Douglas B. Welmaker

Douglas B. Welmaker

CERTIFICATE OF SERVICE

I hereby certify that on December 13, 2023, the foregoing Motion has been served on counsel of record for Defendant Doggie Delight, Inc, via filing with the Court's ECF system.

/s/ Douglas B. Welmaker
Douglas B. Welmaker